

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RE: Tracey Kennedy	CHAPTER 13
Debtor	
Seterus, Inc., as the authorized subservicer for	
Federal National Mortgage Association	
("Fannie Mae"), creditor	CASE NO: 15-14765
Movant	
v.	
Tracey Kennedy	
Respondent	
Frederick L. Reigle, Esquire	
Additional Respondent	

STIPULATION IN SETTLEMENT OF
MOTION FOR RELIEF

COMES NOW, this 20th day of June 2016, Debtor, by and through counsel, Erik B. Jensen, Esquire, and Seterus, Inc., as the authorized subservicer for Federal National Mortgage Association ("Fannie Mae"), creditor, by and through its counsel, Jeniece D. Davis, Esquire, and hereby stipulate to the following terms in settlement of the Motion for Relief;

WHEREAS, the Debtor owns real property at 1910 Dallas Road, Philadelphia, PA 19138; and

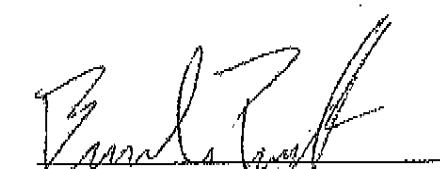
WHEREAS, the Movant holds or services a mortgage on the real property located at 1910 Dallas Road, Philadelphia, PA 19138; and

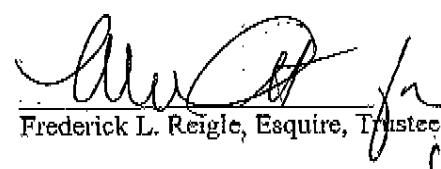
WHEREAS, the Movant filed a Motion for Relief from the Automatic Stay on May 6, 2016; and

WHEREAS, the Debtor and Movant seek to resolve the Motion, it is hereby stipulated and agreed that

1. The Debtor through their counsel will file an amended plan increasing the monthly plan payment to address the post-petition arrears now due of \$9,471.70, which includes ten (10) months of mortgage payments, the Motion for Relief filing fee of \$176.00 and the attorneys' fee of \$850.00 within thirty (30) days of this Order.
2. If the Debtor fails to file the amended plan within the allotted time or make the regular monthly payment and/or their trustee plan payment to the trustee in accordance with the amended plan for one (1) month, Movant may send the Debtor and Debtor's attorney a ten (10) day notice of default. If the Debtor fails to cure the default within ten (10) days from the date of the notice, Movant may certify the default with the court and request that relief be granted. Upon receipt of the Order granting the relief requested, Movant may proceed with the foreclosure action giving the Debtor full credit for all mortgage payments received.
3. Upon conversion of this bankruptcy to a Chapter 7, Movant will send Debtor and Debtor's attorney a ten (10) day notice. If after ten (10) days, the Debtor has failed to contractually reinstate the account, including all late charges, fees and costs, Movant may certify the default.
4. The Debtor agrees that any Order granting relief from the automatic stay shall include a waiver of the F.R.B.P. Rule 4001(a)(3) and that Movant, its successors and/or assigns may act upon the Order immediately.


Jeniece D. Davis, Esquire
Attorney for Movant


Erik B. Jensen, Esquire
Attorney for Debtor


Frederick L. Reigle, Esquire, Trustee

6/17/16